**Public Comment of Deborah Stein, J.D., Network Director of the Partnership for America's Children to the Census Scientific Advisory Committee Meeting, September 2020**

I am submitting these comments on behalf of the Partnership for America's Children, which is helping lead the Count All Kids Committee. The Partnership's mission is to support its network of state and community, multi-issue, child advocacy organizations in effective advocacy. The Partnership has 52 member organizations in 41 states. Our members advocate to improve policies for young children at the state, local, and federal levels. Collectively they represent over 90% of the nation's young children. Partnership members use Census data in their advocacy, and 31 Partnership members are also KIDS COUNT grantees in their state, serving as that state's data hub on young children for policy makers, administrators, and nonprofits. The Partnership members make extensive use of data from the Census Bureau and they understand the importance of getting a complete, fair, and accurate count of young children in the Decennial Census.

As we approach the end of the decennial census data collection period, we note that the Bureau has taken significant steps to improve the count of young children; at the same time, the pandemic and other constraints put this census and the count of young children at higher risk than ever. Thus we want to elevate for the Committee's consideration several items that are essential for measuring the count of young children and assessing whether the efforts taken helped improve the count.

We also note that the Bureau is changing its privacy protections in ways that could significantly affect children.

*Post Enumeration Survey (PES):* We note that the CSAC presentation on the PES makes no mention of the problems seen in the 2010 Census PES operation of unadjusted correlation bias for young children. These problems resulted in an estimated net undercount of only 0.7 percent for the population age 0 to 4 based on the PES methodology compared to 4.6 percent net undercount estimate based on the more widely accepted Demographic Analysis (DA) method. An accurate PES for young children is essential for two reasons. First, it would give us undercount data for more races/ethnicities. Second, it would give us components of census coverage like omissions and erroneous enumeration.

Therefore, the Committee should ask what the Census Bureau plans to do with respect to the problem of correlation bias for young children in the 2020 PES. Does it plan to address this in order to improve the accuracy of the PES for this age group, does it plan to rely solely on the DA method, or something else?

*DA:* If the Bureau has not been able to address the unadjusted correlation problem, the DA becomes even more important. In this context, child advocates also want to make sure the DA method for accessing census undercounts is fully supported. Unless the problem with correlation bias in the PES

estimates is addressed, DA is the only method that will provide measures of census coverage for young children.  Consequently, the DA method is more important for child advocates than it may be for other groups.

Also, for the Demographic Analysis estimates by race that will be released in December 2020 to be useful, the Census Bureau must release a modified race file so that the race categories used in the Census align with those used in the vital events data used to construct the DA estimates.  Until the modified race file is produced, the race data from the DA estimates are not useful. When does the Census Bureau expect to release the modified race file for the 2020 Census?  Production of the modified race file should be a high priority within the Census Bureau.

*Other Evaluation Efforts:* The paragraph below appeared in a recent GAO report (GAO-20-671R).

'In an effort to improve completeness, one team reporting to the Bureau's 2020 Data Quality Executive Governance Group is expanding existing efforts to evaluate coverage of children and the college-age population. Another team is considering use of administrative data, such as data on births in January-March 2020 as a benchmark against which the Bureau can compare data gathered as part of evaluation efforts."

We hope the Census Bureau will provide the CSAC with details about this expanded effort to evaluate coverage of children and the effort to use births from January -March 2020 to evaluate census results documented in this GAO report, and whether this data can also be used for completeness in the decennial census. We ask that this information be made public.

*Privacy:* The most recent data available from the Census Bureau (released May 27, 2020) show that almost two-thirds (64%) of all the census tracts in the country would have errors of more than 10 percent for young children (age 0- to 4) .  In our opinion, that would make such data unusable for most applications.   We are particularly worried that Differential Privacy may introduce distortions in the data used for allocating funding to small geographic areas, where the data variations could results in significant distortions in funding. The biggest programs that we think could be affected by this are education funding programs such as Title 1 and Special Education (IDEA) funds, because education funding is allocated using demographic data for local education agencies (LEAs) which in many states are relatively small geographic areas, where the data variations could result in significant changes in funding. There are also smaller programs that could be affected, such as HeadStart expansion funds.

**Thank you for considering these recommendations, and for giving me this opportunity to comment. I am are happy to provide further information; you can contact me at dstein@foramericaschildren.org or 202-213-8981.**


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